

**FILED**  
TIME 4:00 pm

JAN 20 2017

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

RICHARD W. NAGEL  
Clerk of Court  
CINCINNATI, OHIO

**IN RE APPLICATION OF THE  
UNITED STATES OF AMERICA  
FOR AN ORDER PURSUANT TO  
18 U.S.C. § 2703(d) DIRECTING SPRINT TO  
PROVIDE HISTORICAL CELL SITE  
LOCATION RECORDS RELATED TO  
CELLULAR TELEPHONE NUMBER  
513-832-4903**

**CASE NO.**

**1:17MJ -40**

**UNDER SEAL**

**APPLICATION FOR COURT ORDER  
FOR DISCLOSURE OF HISTORICAL CELL-SITE RECORDS**

The United States of America hereby moves this Court pursuant to 18 U.S.C. § 2703(c)-(d) for an order (1) requiring Sprint, an electronic communication service within the meaning of 18 U.S.C. § 2510(15), to disclose to the Federal Bureau of Investigation (FBI), all available toll records to include call detail, SMS Detail, data sessions, per call measurement data (PCMD), cell site and cell site sector information related to the use of a cellular telephone assigned the telephone number **513-832-4903 (ST7)** for the period from January 1, 2016 to November 5, 2016; (2) precluding the provider of such service from disclosing to the subscriber or customers or to any other unauthorized person this request, any court order issued in connection with this request, the fact of disclosure of such records to the Federal Bureau of Investigation or the existence of this investigation, pursuant to 18 U.S.C. § 2705(b); and (3) sealing the government's application, the Court's order, and any related documents.

In support of this application, the undersigned states as follows:

1. The undersigned is an attorney for the government as defined by Rule 1(b) of the Federal Rules of Criminal Procedure and, therefore, pursuant to 18 U.S.C. § 2703(c) may apply for an order as requested herein.

2. The FBI is conducting a criminal investigation involving Jennifer LITTLE, Deanna WILLIAMS, Alex PATEL, and other as-yet unknown individuals in connection with possible criminal violations, including, among others, 18 U.S.C. § 1951, and that it is believed that a subject of the investigation has used a cellular telephone assigned the telephone number **513-832-4903 (ST7)** during the period of January 1, 2016 to November 5, 2016 and that the requested location records for cellular towers used to make or receive calls on the subject cellular phone are relevant and material to the ongoing criminal investigation.

3. On or about August 4, 2016, Federal Bureau of Investigation Special Agent Peter Lakes met with a Confidential Source, hereinafter CS1. CS1 has provided information in the past that was corroborated by independent investigation and is considered to be reliable by SA Lakes. During this meeting, CS1 advised SA Lakes of a robbery which occurred in or around Monroeville, PA on or about April 2, 2016. Further, CS1 advised the information detailing this robbery could be found on YouTube based upon the search parameters "Million Dollar Jewelry Heist Pennsylvania."

4. SA Lakes searched YouTube using these same search parameters and found a news clip filed by WPXI in Pittsburgh, PA. SA Lakes and CS1 viewed the news clip together. This news clip detailed the circumstances surrounding theft of approximately \$1.25 million in jewelry, to include a surveillance video retrieved from the restaurant near the location of the crime. Shown in the surveillance video were four individuals who were identified by the WPXI reporter as the likely suspects in the robbery, pass in front of the camera and soon thereafter returned in front of

the camera carrying several luggage bags. One of the individuals dropped her hat and was shown to be struggling to carry one of the bags. A second female is shown in the video to assist the female who dropped her hat and was struggling with the bag she was carrying. At this point in the viewing of the video, CS1 identified the female who dropped her hat as Jenny LITTLE, and the female who was assisting LITTLE was Deanna WILLIAMS. CS1 further advised LITTLE was a close friend of Alex PATEL, who was the organizer of the robbery. Additionally, CS1 advised the group had committed similar robberies in Texas and in Florida. However, CS1 is not aware of the dates of the Florida and Texas robberies. CS1 also advised LITTLE is a close friend with WILLIAMS and the two are users of heroin. CS1 provided 513.465.9818 (ST1) as the number used by Jenny LITTLE. Furthermore, CS1 advised Deanna WILLIAMS had been arrested by the Middletown Police in early July 2016 for shoplifting.

5. SA Lakes contacted Middletown Police and was advised that Deanna WILLIAMS was arrested on or about July 7, 2016. At the time of her arrest, WILLIAMS provided 513.464.2088 (ST2) as her cell phone number.

6. SA Lakes has searched the Ohio Law Enforcement Gateway (OHLEG) for Jennifer LITTLE and Deanna WILLIAMS and has compared the Ohio Drivers' License Photos found in OHLEG to the pictures in the YouTube video and submits the Ohio Drivers' License Photos very closely resemble the females in the YouTube video submitted by WPXI regarding the jewelry theft in Monroeville, PA on or about 4/2/2016.

7. SA Lakes has learned that several years ago, Alex PATEL was part of a mortgage fraud investigation conducted by the FBI surrounding a short sale of property in the Mason, Ohio area. Mimi Chang, who has been identified as a girl friend of Alex PATEL, short sold a property known as 8839 Bayside Court, Mason, Ohio, to PATEL for \$1.59 Million, on or about 12/18/2008, after purchasing this property for \$1.9 million two years prior.



8. Soon after the aforementioned robbery in Monroeville, PA, a court order was issued to several cell phone providers for information relating to calls utilizing cell towers near the location of the crime on the date of the crime (April 2, 2016). SA Lakes has reviewed the data provided by some of the cell phone providers and determined several calls were made to or received by 513.600.6600 (ST3) utilizing these towers. The number most frequently in contact with this number is 513.464.1837 (ST4). A search of Lexis Nexis for 513-600-6600 returned Mimi Chang and Alex PATEL as known users of this number. A search of Lexis Nexis for ST4 failed to return any identified users of this number.

9. On or about November 7, 2016 a cooperating defendant who has provided information that has been corroborated through independent investigation, advised Aaron NICHOLS was one of the individuals involved in a similar Jewelry Heist that occurred in or around the Atlanta, Georgia area. The Cooperating Defendant was not entirely certain of the date of the Atlanta robbery, but advised Nichols accompanied Alex PATEL, Mimi CHANG, and others to Georgia to conduct the robbery. Additionally, the cooperating defendant advised SA Lakes that NICHOLS' cellular phone was **513-832-4903 (ST7)**.

10. Due to fact the Cooperating Defendant is unsure of the dates of the robbery in Atlanta, the FBI has been unable to identify a reported robbery.

11. SA Lakes has received cell site history for a phone belonging to Mimi CHANG, 513-600-6600 (ST1). CHANG is the girlfriend of Alex PATEL. The information provided indicates this phone was in Monroeville, PA during the jewelry robbery which occurred on April 2, 2016. The information provided also indicates this phone was in the Atlanta, GA area on February 26, 2016; March 7, 2016; May 28-31, 2016; and June 20, 2016.

12. Information requested from Sprint will allow the FBI to ascertain if **513-832-4903 (ST7)** was in the Atlanta, GA area at the same time 513.600.6600 (ST1) was in the Atlanta area. Analysis of the two phones will generate leads to compare to any reported robberies.

13. Based upon the foregoing, Agents believe Alex PATEL, Deanna WILLIAMS, Mimi CHANG, Aaron NICHOLS, and others yet identified, were involved in the aforesaid unidentified robbery of jewelry in the Atlanta, GA area. Request is hereby made to issue an order of the court directing Sprint to provide cell site historical information for **513-832-4903** for the time period January 1, 2016 to November 5, 2016 to ascertain if this phone was in the Atlanta, GA area and the times and dates of travel to ascertain if there were any reported robberies that coincide with NICHOLS' travels.

14. Disclosure of this application, the Court's order, or the fact that the requested records have been produced to the FBI may seriously jeopardize this pending criminal investigation.

15. WHEREFORE, applicant requests the Court to enter the attached Order requiring Sprint to disclose to the FBI all available toll records to include call detail, SMS Detail, data sessions, per call measurement data (PCMD), cell site and cell site sector information related to the use of a cellular telephone assigned the telephone number **513-832-4903 (ST7)** for the period from January 1, 2016 to November 5, 2016; (2) precluding the provider of such service from disclosing to the subscriber or customers or to any other unauthorized person this request, any court order issued in connection with this request, the fact of disclosure of such records to the FBI or the existence of this investigation, pursuant to 18 U.S.C. § 2705(b); and (3) sealing the

government's application, the Court's Order and any related documents until otherwise ordered by the Court.

Executed on January 20, 2017.

Respectfully submitted,

BENJAMIN C. GLASSMAN  
United States Attorney

*s/Timothy D. Oakley*

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